

EXHIBIT “A”

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TINA EASLEY

and

CAROLINE EASLEY

Plaintiffs,

vs.

CIVIL ACTION NO. 10-CV-3922(TON)

WORLDWIDE RECOVERIES, LLC

and

DANIEL SCHIELE a.k.a. DAN DURBIN,
a.k.a DAN DURBINSCHIELE

and

CHRIS MEYERS

and

JOHN DOES 1-10,

Defendants.

CERTIFICATION OF ANDREW M. MILZ, ESQUIRE

I, ANDREW M. MILZ, ESQUIRE, certify the following to be true and correct:

I am an adult individual, a member of the bar of this Court in good standing. I am counsel for the Plaintiffs Tina Easley and Caroline Easley in the above-captioned action. This Certification is submitted in support of Plaintiffs' Motion for Entry of Default Judgment.

Biography

1. I am an attorney at the Lundy, Flitter, Beldecos & Berger, P.C., law firm. I have been an associate at the Lundy Flitter law firm since April 2008. Prior to that, I was a law clerk at the Lundy Flitter firm and the Philadelphia law firm Donovan Searles, LLC.

2. I am admitted to practice and a member in good standing before the state courts of Pennsylvania and New Jersey, the United States District Courts for the Eastern District of

Pennsylvania and the District of New Jersey, and the United States Court of Appeals for the Third Circuit.

3. I am a January 2008 graduate of Temple University School of Law.

4. While at Temple, I was awarded distinctions for brief writing and outstanding oral advocacy in Temple's Integrated Trial Advocacy Program.

5. I was Executive Editor of the Temple Political and Civil Rights Law Review.

6. I am the author of *But Names Will Never Hurt Me?*, 16 Temp. Pol. & Civ. Rts. L. Rev. 283 (2006).

7. I hold a Master of Arts in English Literature from the University of Scranton and a Bachelor of Arts in English, *cum laude*, from King's College.

8. At the Lundy Flitter firm, I primarily practice in the area of consumer protection law, including cases arising under the Consumer Credit Protection Act, 15 U.S.C. §1601, *et seq.*

9. I have litigated several individual and class cases under the Fair Debt Collection Practices Act subchapter. *See e.g. Mushinsky v. Nelson, Watson & Assts.*, 642 F. Supp. 2d 470 (E.D. Pa. 2009); *Gregory v. NCO Financial*, U.S.D.C. E.D. Pa. No. 07-CV-5254(RB) (FDCPA class action; final approval dated Mar. 2, 2010).

10. I have litigated two consumer protection cases in federal jury trials: *Wise v. Americredit Fin. Servs., Inc.*, U.S.D.C. E.D. Pa. No. 09-cv-00102 (Robreno, J.) (Fair Credit Reporting Act, Pennsylvania's Uniform Commercial Code, Fair Credit Extension Uniformity Act); *Cappuccio v. Prime Capital Funding*, U.S.D.C. E.D. Pa. No. 07-cv-04627 (Sanchez, J.) (Truth in Lending Act, Equal Credit Opportunity Act, Pennsylvania's Unfair Trade Practices and Consumer Protection Law).

11. My hourly rate for 2009 was \$210.00 per hour. This rate was approved by Judge Cynthia Rufe of the United States District Court for the Eastern District of Pennsylvania in the FDCPA class action *Rosenau v. Unifund*, 646 F. Supp. 2d 743 (E.D. Pa. 2009).

12. My hourly rate for 2010 was \$225.00 per hour.

13. My hourly rate for 2011 is \$245.00 per hour.

Litigation of the Instant Case

14. The attorney's fees and costs sought by Plaintiffs are reasonable and were necessarily incurred in the prosecution of this case.

15. In prosecuting this action on behalf of Plaintiffs, I conferred with Plaintiffs about their case, conducted background research on the Defendants, researched the legal claim under FDCPA caselaw, drafted and edited the Complaint, oversaw service of the Complaint on Defendants, wrote letters to Defendants regarding this matter, filed for default, drafted the instant Motion for Default Judgment, drafted the instant Damages Hearing Memorandum, conferred with clients, arranged certifications and exhibits, and otherwise prepared for the January 20, 2011 damages hearing.

16. Defendants were first served with a copy of the Summons and Complaint by certified mail on August 13, 2010. Defendants were then served by personal service on September 22, 2010. The Affidavits of Service were docketed of record.

17. After default was entered by the Clerk, Plaintiffs filed their Motion for Default Judgment, serving a copy of the moving papers on all Defendants via U.S. First Class Mail on December 6, 2010.

18. By Order dated December 20, 2010, the Court scheduled a damage hearing for January 20, 2011 at 10:00 a.m. Plaintiffs served all Defendants with a copy of this Order by U.S.

First Class Mail dated December 22, 2010. (See Exhibit "1" hereto, letters from Milz to Defendants).

19. My billing entries were recorded contemporaneously with my actions on behalf of Plaintiffs in this case. A true and accurate copy of my firm's billing records for this matter is attached hereto as Exhibit "2."

I certify under penalty of perjury that the foregoing is true and correct.

Date: 1/19/11

/s/ Andrew M. Milz
ANDREW M. MILZ

EXHIBIT “I”

LUNDY, FLITTER, BELDECOS & BERGER, P.C.

STUART R. LUNDY
CARY L. FLITTER
ANTHONY J. BELDECOS
PHILLIP D. BERGER
ERIC C. MILBY
THEODORE E. LORENZ
BRENDA GLASER ABRAMS
DEBORA A. GONZALEZ
ANDREW M. MILZ
MICHAEL P. DECKTOR
JESSICA M. GULASH

ATTORNEYS AT LAW
450 N. NARBERTH AVENUE
NARBERTH, PA 19072
(610) 668-0770
FAX (610) 667-0552
FAX (610) 668-7481

MARLTON, NJ
(856) 338-1300

EMAIL: AMILZ@LFBB.COM
DIRECT DIAL: 610-822-0781

December 22, 2010

VIA FIRST CLASS MAIL

Worldwide Recoveries, LLC
2414 S. Fairview Street #210
Santa Ana, CA 92705

**RE: Tina Easley and Caroline Easley v. Worldwide Recoveries, LLC,
Daniel Schiele a.k.a. Dan Durbin a.k.a. Dan Durbinschiele,
Chris Meyers, and John Does 1-10
U.S.D.C. E.D. Pa. Civil Action No. 10-CV-3922(TON)**

Dear Sir or Madam:

Enclosed please find a copy of an Order entered by Judge O'Neill on December 20, 2010 scheduling an assessment of damages hearing for Thursday, January 20, 2011, at 10:00 A.M. in Courtroom 4-A, U.S. Courthouse, Philadelphia, PA.

Please feel free to call me should you wish to discuss this matter.

Very truly yours,



ANDREW M. MILZ

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Enclosure

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STUART R. LUNDY
CARY L. FLITTER
ANTHONY J. BELDECOS
PHILLIP D. BERGER
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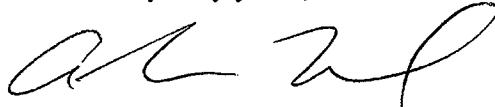
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Daniel Schiele a.k.a. Dan Durbin a.k.a. Dan Durbinschiele,
Chris Meyers, and John Does 1-10
U.S.D.C. E.D. Pa. Civil Action No. 10-CV-3922(TON)**

Dear Mr. Schiele:

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Please feel free to call me should you wish to discuss this matter.

Very truly yours,



ANDREW M. MILZ

AMM:seh
Enclosure

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LUNDY, FLITTER, BELDECOS & BERGER, P. C.

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December 22, 2010

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Santa Ana, CA 92705

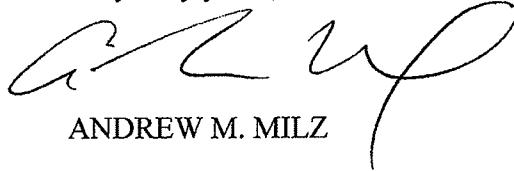
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U.S.D.C. E.D. Pa. Civil Action No. 10-CV-3922(TON)**

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Please feel free to call me should you wish to discuss this matter.

Very truly yours,



ANDREW M. MILZ

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Enclosure

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EXHIBIT “2”

January 18, 2011

Tina Easley and Caroline Easley
 539 Carpenter Lane, Apt. F3
 Philadelphia, PA 19119

Attention: File #: 6848.001
 Inv #: Sample

RE: Worldwide Recoveries

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
May-31-10	Conference NF re facts, 3d party contact; tel call client, do engagement ok	0.00	0.00	CLF
Jun-02-10	Easley/Law Office of Mitchell N Kay: discussed contact by collector w/office mates; need to document 5/21; reviewed docs provided by TE w/CLF 5/31; phoned TE; discussed contact by collector w/her mother; need to document; discussed credit reports; need to gather add'l doc & send to NF; Research phone numbers provided by TE to determine if collection is from MNKay.	3.00	480.00	NGF
Jun-23-10	Review of email from NGF; preparation of NAI & engagement letter; initiate new file; scan documents	0.50	80.00	JMR
Jul-12-10	Phone call w/ client re facts, damages, effect of harassment on her; memo to file	1.00	245.00	AMM
	Review file (.3); research into Defendants (.6); draft FDCPA complaint for c,d,e claims (1.6)	2.50	612.50	AMM
Jul-16-10	Conference CLF re: status of complaint	0.20	82.00	TEL
Jul-26-10	Finalize detailed FDCPA complaint	0.50	122.50	AMM
Jul-27-10	Edits to Complaint per TEL, add FCEUA claim; proof	0.80	196.00	AMM
	Review and edit draft complaint	0.30	123.00	TEL
Jul-29-10	Phone call w/ client re her review to complaint; edits thereto	0.30	73.50	AMM
Aug-06-10	Phone call from client re continued phone calls from DC this week	0.20	49.00	AMM

Sep-15-10	Phone call w/ N. Carolina counsel re other suits against Defs	0.30	73.50	AMM
	Cross w/ CLF re taking default after pers serv.; SH to arrange for personal service of Def's	0.30	73.50	AMM
Oct-15-10	Review status; preparation of entry of default against Def's, AMM cert in support; file	1.00	245.00	AMM
Nov-19-10	Receive and review court order re moving for default judgment w/i 14 days; conference CLF re same	0.30	73.50	AMM
Dec-03-10	Draft motion for default judgment package; preparation for filing, file	2.90	710.50	AMM
	Review and edit motion for default judgment; Conference AMM re: same	0.80	328.00	TEL
Dec-22-10	Phone call w/ client re procedure at damages hearing	0.40	98.00	AMM
Jan-11-11	Phone call w/ client in preparation of hearing next week	0.30	73.50	AMM
Jan-13-11	Phone call w/ client Caroline E. re damages; draft Cert of client in support of damage award; lett to client; preparation of fed ex; send	1.50	367.50	AMM
Jan-16-11	Draft damages hearing memo (incl fee app); edit	3.00	735.00	AMM
Jan-18-11	Draft cert of AMM in support of motion for default judgment and stattoy fees for damage hearing	0.50	122.50	AMM
	Phone call Caroline E. re status of hearing	0.20	49.00	AMM
	Edit AMM Cert in support of damages; preparation of for hearing; organize exs	1.80	441.00	AMM
	Phone call Tina in preparation for damages hearing	1.00	245.00	AMM
	Travel to and attend damages hearing before J. O'Neill on 1/20/11 (est)	3.00	735.00	AMM

Totals	26.60	\$6,434.00
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FEE SUMMARY:

Lawyer	Hours	Effective Rate	Amount
Andrew M. Milz	21.80	\$245.00	\$5,341.00
Theodore E. Lorenz	1.30	\$410.00	\$533.00
Joan M. Raughley	0.50	\$160.00	\$80.00
Nancy G. Flitter	3.00	\$160.00	\$480.00

DISBURSEMENTS		Disbursements	Receipts
Jul-21-10	Westlaw (07/01/10 - 07/15/10)	33.76	
Aug-05-10	Clerk, U.S. District Court - Complaint Filing Fee	350.00	
Aug-10-10	Postage Expense	18.96	
Sep-21-10	Forever-Code 6 Professional Process Servers - Service of Summons and Complaints on 3 Defendants	65.00	
	Federal Express Pak - B. Zambrano	43.00	
Dec-22-10	Westlaw (12/01/10 - 12/15/10)	23.41	
Jan-17-11	Federal Express - C. Easley	17.00	
Totals		\$551.13	\$0.00

Total Fees & Disbursements	\$6,985.13
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Previous Balance	\$0.00
Previous Payments	\$0.00

Balance Due Now	\$6,985.13
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AMOUNT QUOTED:	\$0.00
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